EXHIBIT B

U.S. Patent No. US 9,118,712 v. Broadcom

1. Claim Chart

Claim	Analysis
[1.P] A method for connecting user browser software running on a user computer to the internet for the purposes of data communication with internet data sources, the method comprising the steps of:	Broadcom ("Company") performs and induces others to perform a method for connecting user browser software running on a user computer to the internet for the purposes of data communication with internet data sources. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, Company provides Symantec Web Isolation, a Remote Browser Isolation (RBI) solution designed to mitigate online threats associated with web browsing, such as malware. The Web Isolation executes the web sessions in a disposable cloud container, away from the user, ensuring that no original code, which may contain malicious content, reaches the end user's device. Furthermore, Web Isolation renders the web content to the user on their device. Therefore, it would be apparent to a person having ordinary skills in the art that Symantec Web Isolation performs the method of connecting the user's browser to the internet via the disposable cloud container.

Symantec by Broadcom

Symantec® Web Isolation

Adaptive Rendering, Document Isolation and Advanced Threat Protection for Cloud Solutions

The Uncategorized and Risky Web: Critical Attack Vectors

IT security teams experience a constant barrage of attacks attempting to penetrate defenses and steal data. According to Symantec research, the vast majority of these cyber attacks originate from the web and email.

Cybercriminals leverage a variety of malware and social engineering tactics to dupe employees into infecting devices and networks with malware, often by luring them to malicious websites.

Source: https://docs.broadcom.com/doc/web-isolation-en, page 1

Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation

How web isolation helps

Symantec Web Isolation, a Remote Browser Isolation (RBI) solution, mitigates the risks associated with web browsing. Web isolation executes web sessions in a disposable cloud container. The endpoint receives a safe rendering of the page created by the web isolation service. Yet it preserves the original website's behavior and experience.

RBI solutions are evaluated based on two fundamentals:

1. Ensuring that no original code of the destination server reaches the end user's device.
2. Providing a seamless experience for end users who access isolated websites.

Source: https://www.security.com/expert-perspectives/secure-web-surfing

How Does This Work?

Symantec Web Isolation connects each active browser tab to a secure browser running in a container either on-premise or in the cloud. This secure browser interacts with the internet for the user, ensuring attacks stay away from the local machine, while preserving the user experience. Information from the secure browser is rendered back to the end user, and unless visually indicated, users may not even know they are being isolated. To ensure high system availability, Symantec dual mode isolation automatically selects the right method for each class of webpage, whilst providing an operational failsafe.

Source: https://www.security.com/feature-stories/symantec-web-isolation-essential-part-your-sase-strategy

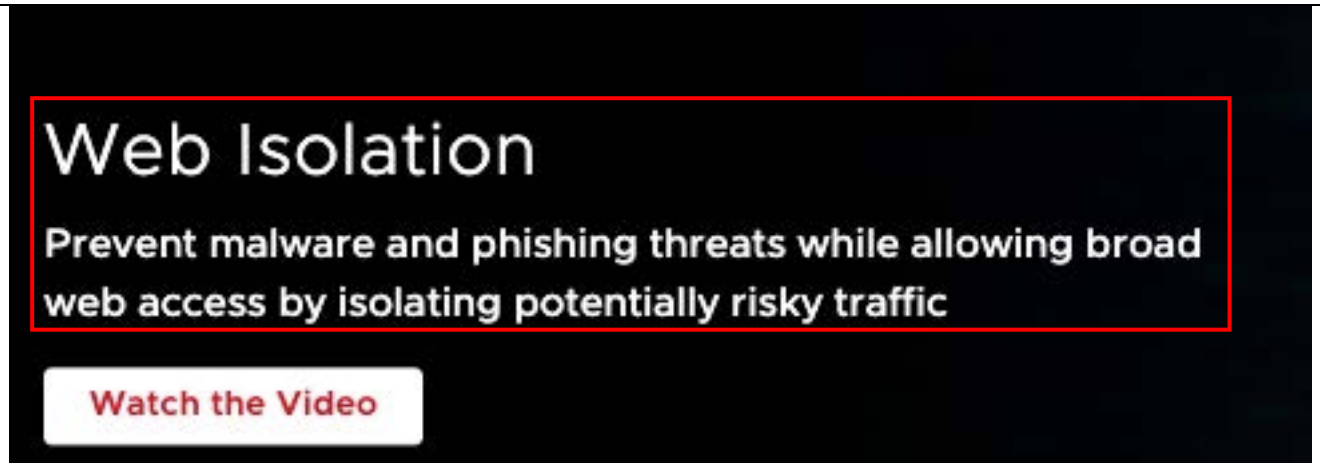
Prevent websites from delivering zero-day malware and phishing threats to users' devices

Secure your employees' risky web traffic to eliminate threats targeting browser vulnerabilities

Symantec Web Isolation executes web sessions away from endpoints, sending only a safe rendering of information to users' browsers thereby preventing any website-delivered zero-day malware from reaching your devices. When combined with Symantec Secure Web Gateways, policies drive traffic from uncategorized sites or URLs with suspicious or potentially unsafe risk profiles through Isolation for safe browsing. By integrating with Symantec messaging solutions, Web Isolation isolates links in email to prevent phishing threats and credential attacks.

Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation

	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.
[1.1] providing a software rendering application that is: (i) remote from the user computer, and (ii) in data communication with the user computer;	Company performs and induces others to perform the step of providing a software rendering application that is: (i) remote from the user computer, and (ii) in data communication with the user computer. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, Symantec Web Isolation ("software rendering application") executes the user's web sessions in a disposable cloud container, rather than on their local browser ("remote from the user computer"), to mitigate the online threats or malicious content. Further, the browsed content is rendered to the user for interaction ("in data communication with the user computer"). Source: https://docs.broadcom.com/doc/web-isolation-en, page 1(annotated)



Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation

How web isolation helps

remote from the user computer

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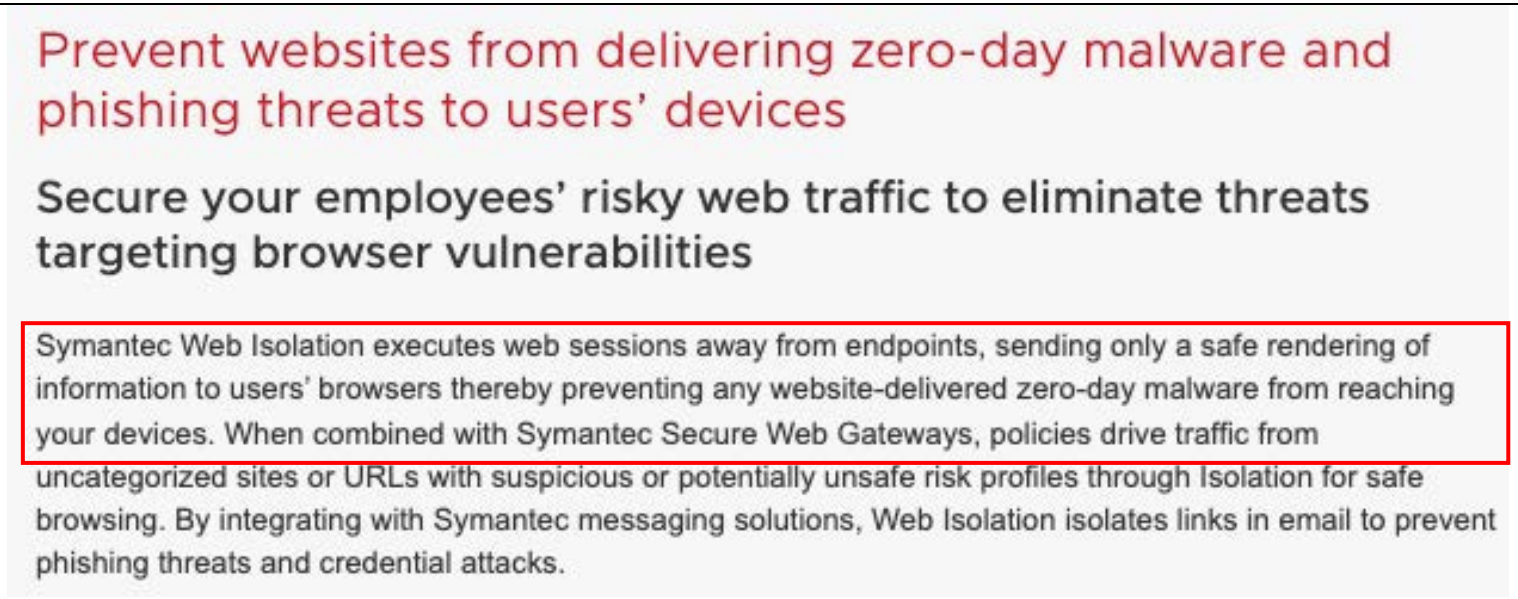
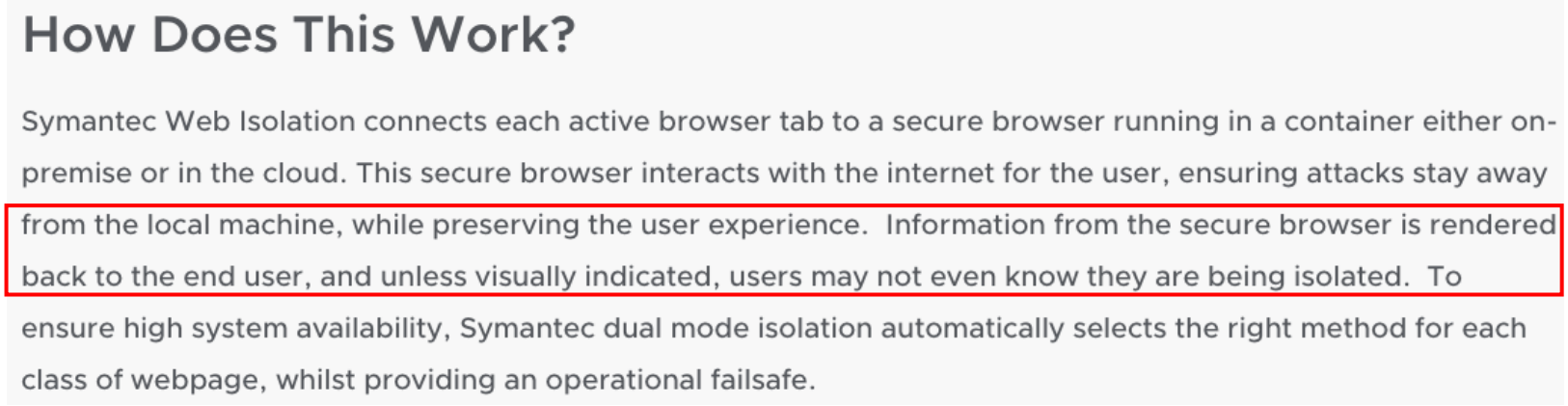
2. Providing a seamless experience for end users who access isolated websites.

Source: https://www.security.com/expert-perspectives/secure-web-surfing (annotated)



Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation



Source: https://www.security.com/feature-stories/symantec-web-isolation-essential-part-your-sase-strategy

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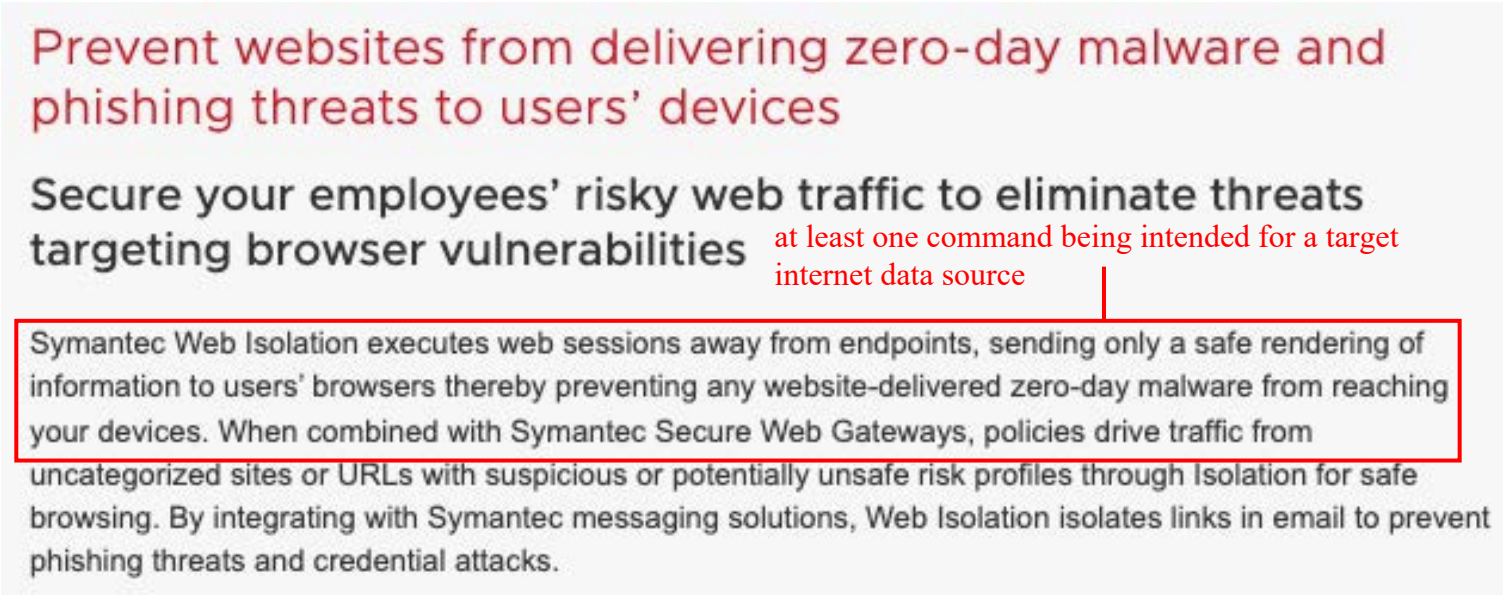
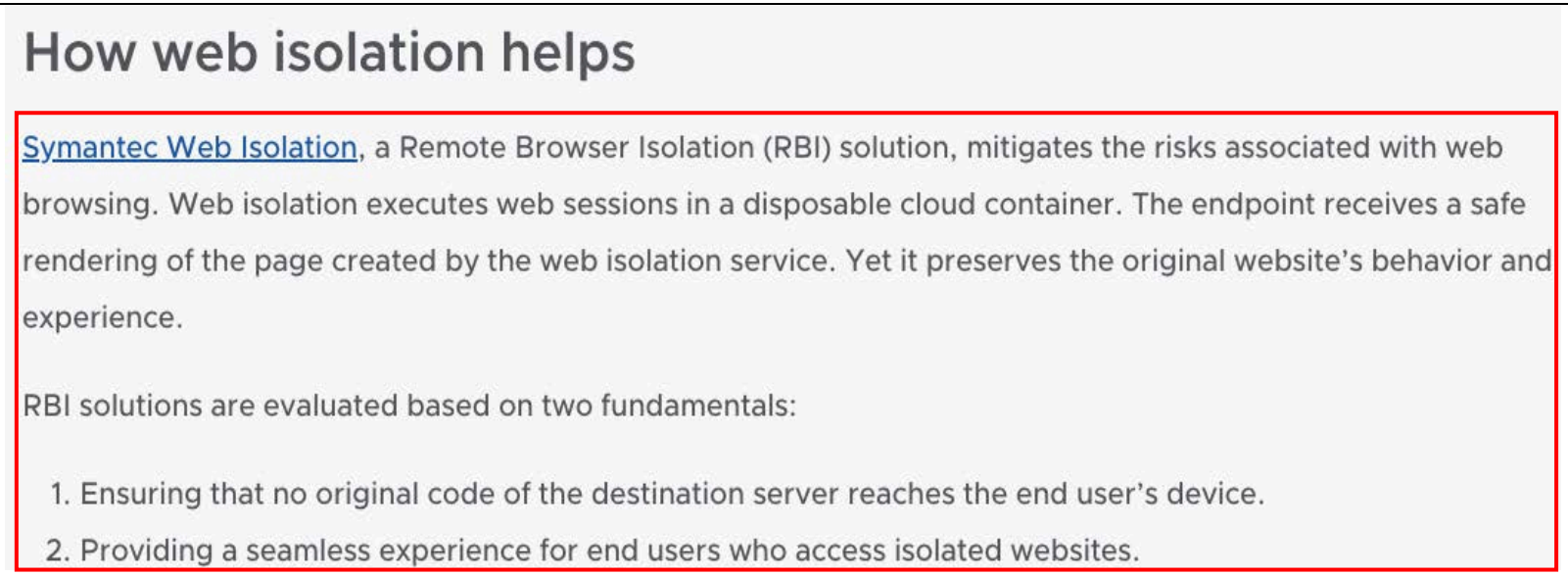
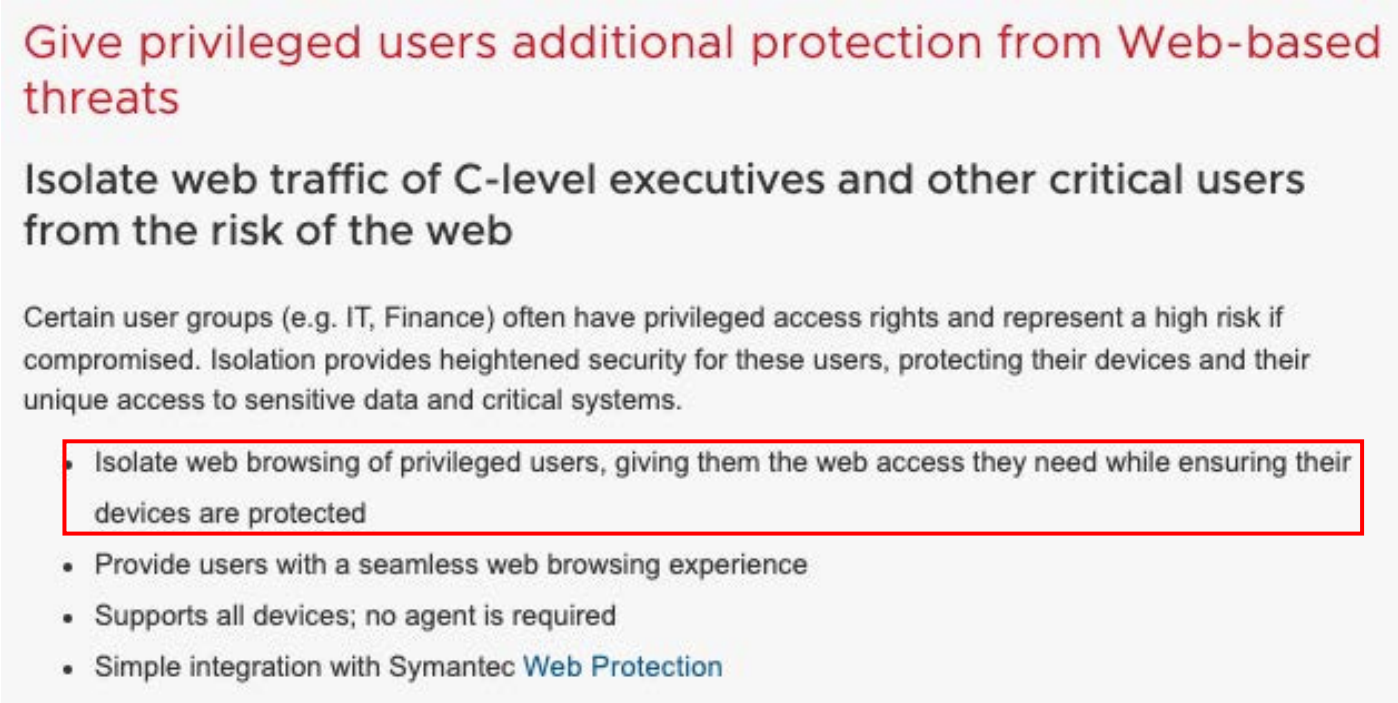
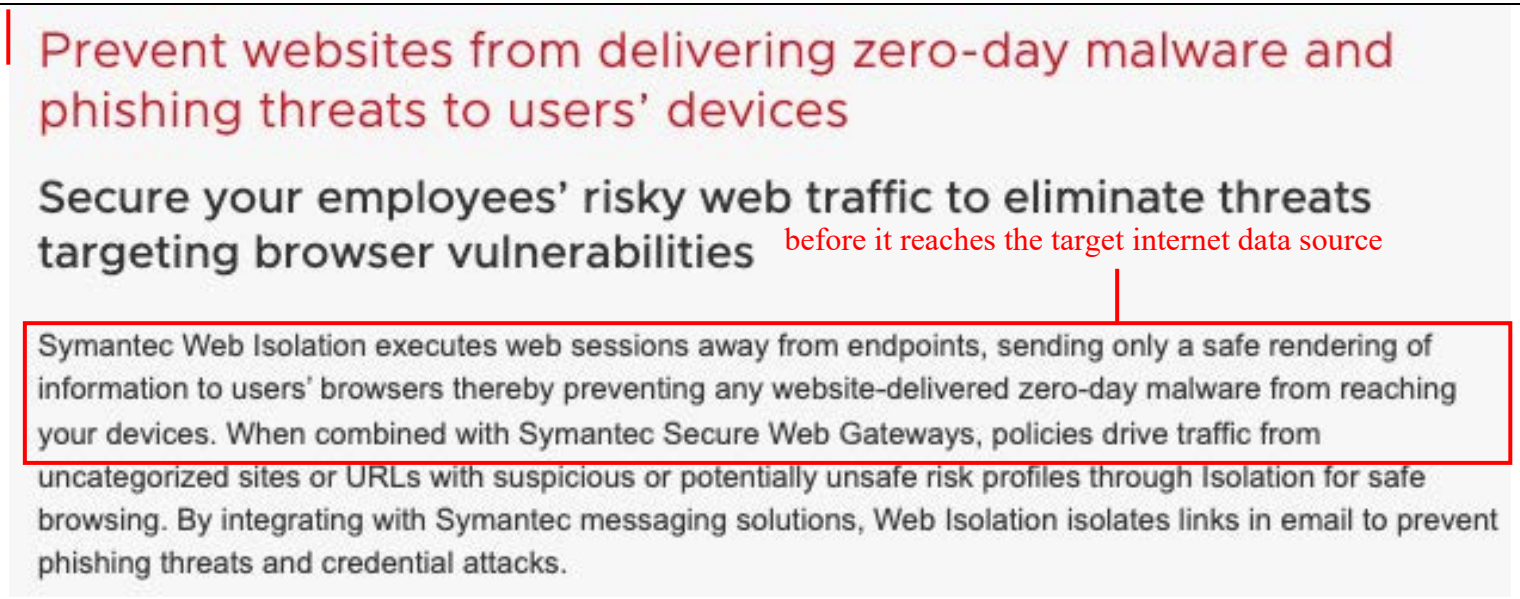
[1.2] issuing at least one command from the user browser software, the at least one command being intended for a target internet data source internet data sources;	Company performs and induces others to perform the step of issuing at least one command from the user browser software, the at least one command being intended for a target internet data source internet data sources. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, Symantec Web Isolation allows users to access web content ("issuing at least one command") safely from the browser running on their devices. Further, Web Isolation directs the user's request from the local browser to a disposable remote container, where it is processed, ensuring that malicious content ("at least one command being intended for a target internet data source") does not reach the user's device. Give privileged users additional protection from Web-based threats Isolate web traffic of C-level executives and other critical users from the risk of the web Certain user groups (e.g. IT, Finance) often have privileged access rights and represent a high risk if compromised. Isolation provides heightened security for these users, protecting their devices and their unique access to sensitive data and critical systems. • Isolate web browsing of privileged users, giving them the web access they need while ensuring their devices are protected • Provide users with a seamless web browsing experience • Supports all devices; no agent is required • Simple integration with Symantec Web Protection issuing at least one command

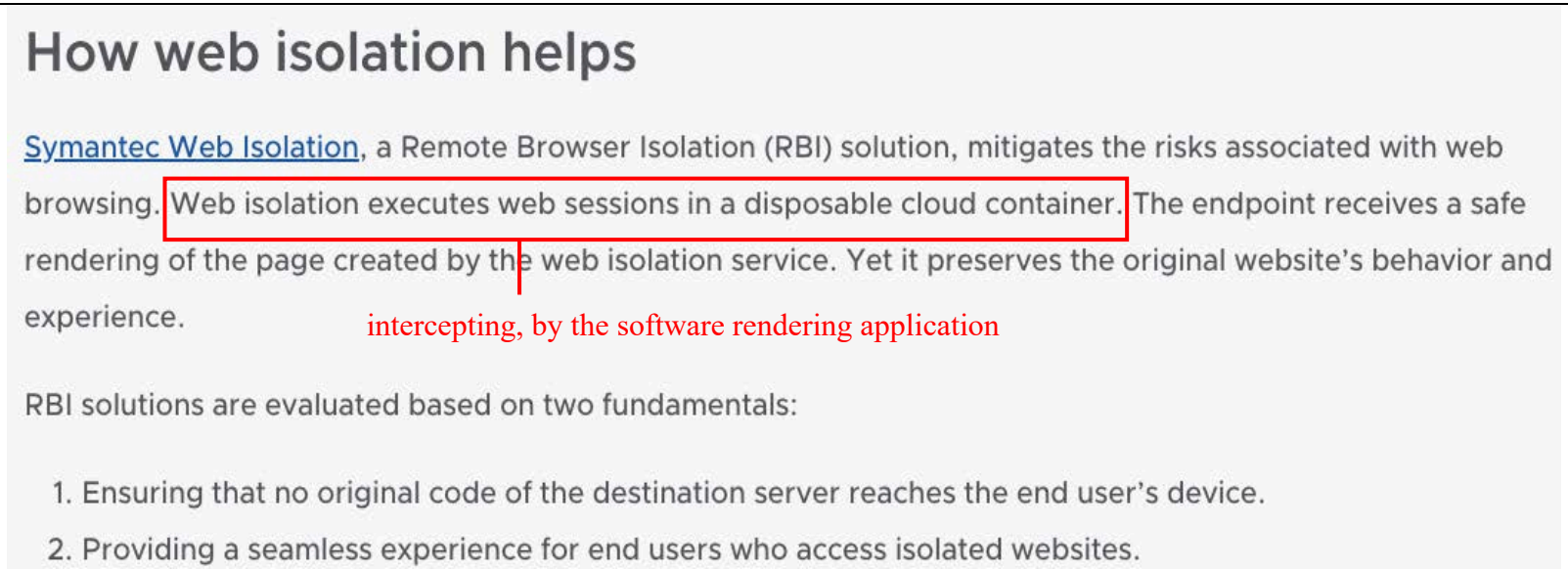
	Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation (annotated)  Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation (annotated)

	 Source: https://www.security.com/expert-perspectives/secure-web-surfing Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[1.3] intercepting, by the software rendering application, the at least one command before it reaches the target internet data source;	Company performs and induces others to perform the step of intercepting, by the software rendering application, the at least one command before it reaches the target internet data source. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, after the user requests web content, the Web Isolation executes the request in a disposable cloud container rather than on the user's local browser ("intercepting, by the software rendering application"), ensuring that malicious content does not reach the user's device ("before it reaches the target internet data source").  Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation



Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation (annotated)



Source: https://www.security.com/expert-perspectives/secure-web-surfing (annotated)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[1.4] proxying, by the software rendering application, the at least one command;	Company performs and induces others to perform the step of proxying, by the software rendering application, the at least one command. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, the Web Isolation functions as a proxy ("proxying") and executes the user's web sessions in a disposable cloud container. Web Isolation Explicit Proxy Last Updated October 24, 2023 proxying Learn about how the Web Isolation functions as an explicit proxy. In this topology, all components belong to the Web Isolation Platform and the Web Isolation functions as a proxy. All the organization's endpoints communicate directly with the Web Isolation Proxy. Isolation and inspection of the SSL traffic on the organization's network is provided by deployment of CA certificates that are held by the Proxy. The web server's original responses to HTTP/S requests never reach the client; all HTTP/S responses are provided to the endpoint as isolated content. The Proxy handles content blocking and standard communication with web servers for Pass webpages. For an explanation of the Web Isolation block page, see Block Page. This topology requires minimal configuration on the endpoint browser, which you can deploy easily through a GPO. Source: https://www.websense.com/content/support/library/rbi/on-prem/v2305/rbi_2305_dg_en-us.pdf (annotated)

How web isolation helps

Symantec Web Isolation, a Remote Browser Isolation (RBI) solution, mitigates the risks associated with web browsing. Web isolation executes web sessions in a disposable cloud container. The endpoint receives a safe rendering of the page created by the web isolation service. Yet it preserves the original website's behavior and experience.

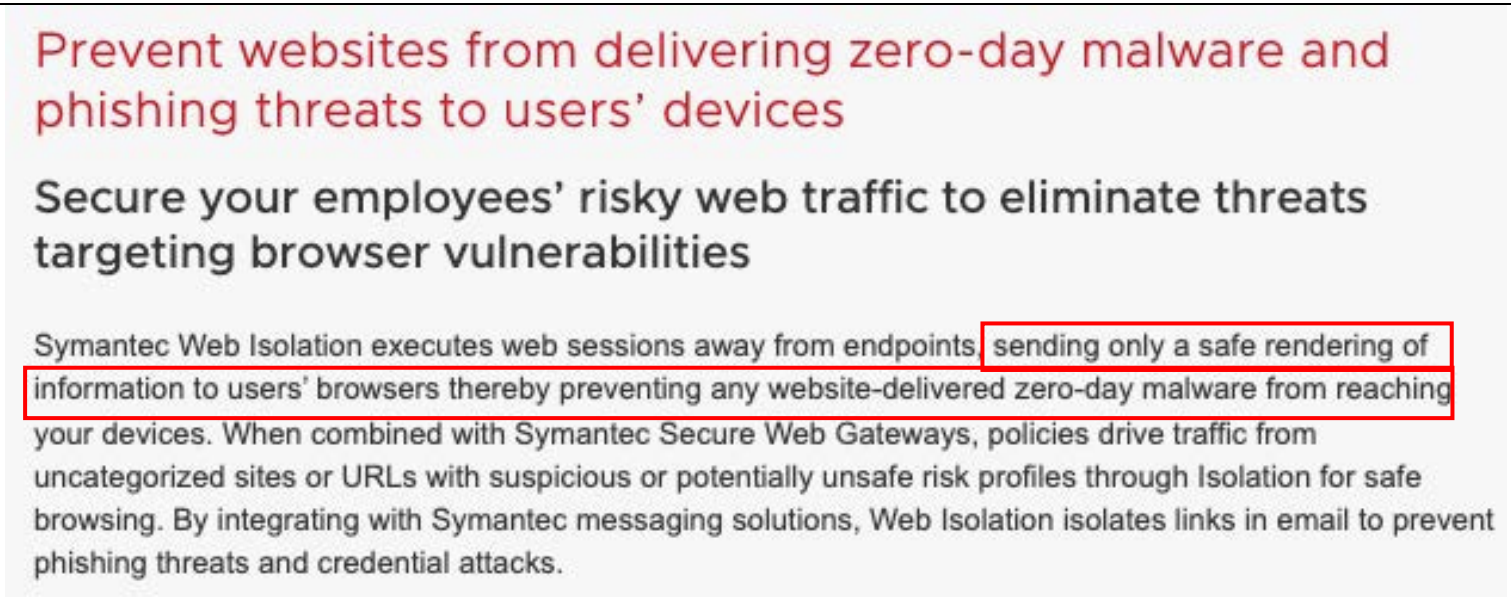
RBI solutions are evaluated based on two fundamentals:

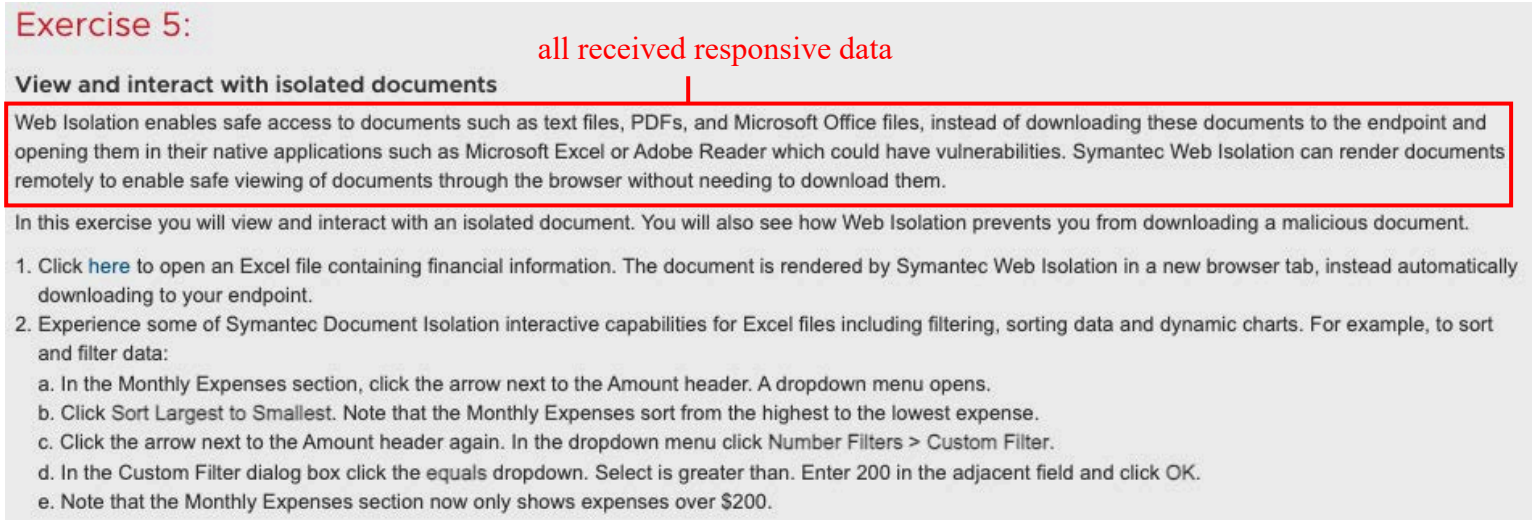
1. Ensuring that no original code of the destination server reaches the end user's device.
2. Providing a seamless experience for end users who access isolated websites.

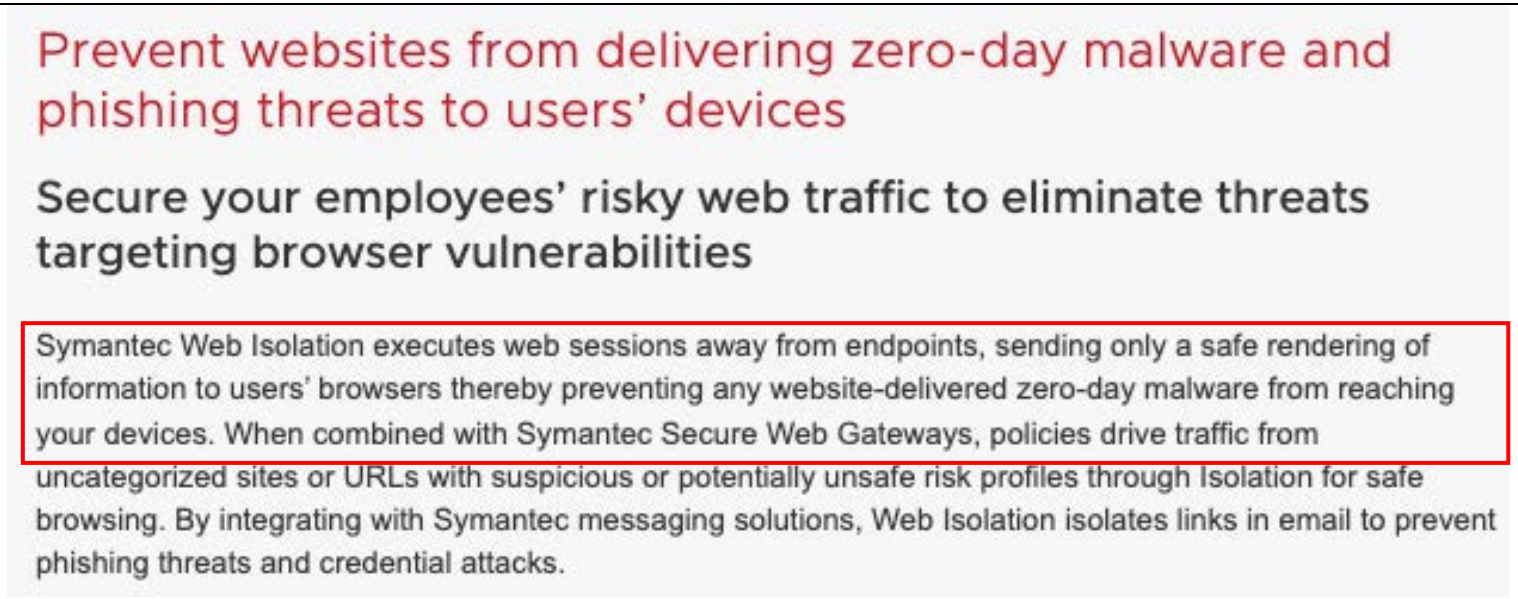
Source: https://www.security.com/expert-perspectives/secure-web-surfing

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[1.5] receiving, by the software rendering application, responsive data comprising original user functionality through the internet from the target internet data source;	Company performs and induces others to perform the step of receiving, by the software rendering application, responsive data comprising original user functionality through the internet from the target internet data source. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, after executing the user's web sessions in a disposable cloud container, Web Isolation renders the received information securely to the user's device. Therefore, it would be apparent to a person having ordinary skill in the art that Web Isolation enables the cloud container to receive responsive data, comprising the original user functionality, through the internet. **How web isolation helps** Symantec Web Isolation, a Remote Browser Isolation (RBI) solution, mitigates the risks associated with web browsing. Web isolation executes web sessions in a disposable cloud container. The endpoint receives a safe rendering of the page created by the web isolation service. Yet it preserves the original website's behavior and experience. RBI solutions are evaluated based on two fundamentals: 1. Ensuring that no original code of the destination server reaches the end user's device. 2. Providing a seamless experience for end users who access isolated websites. Source: https://www.security.com/expert-perspectives/secure-web-surfing

	 Source: https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.
[1.6] automatically rendering, by the software rendering application, all received responsive data into an interactive pixilated image as a	Company performs and induces others to perform the step of automatically rendering, by the software rendering application, all received responsive data into an interactive pixilated image as a layer defined by pixilated image data such that no original browser executable code will be executed at the user computer. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, Web Isolation processes user-requested web content, which may contain malicious code, within a cloud container and sends only safe rendering information, such as text files and PDFs ("all received responsive data"), to the user's local browser. As a result, this process enables users to visit potentially dangerous websites without the risk of infection, ensuring that no original code reaches their devices. Therefore, upon information and belief, the rendered content is presented as an interactive pixilated image as a layer defined by pixilated image data such that no original browser executable code will be executed on the user's device.

layer defined by pixilated image data such that no original browser executable code will be executed at the user computer;	 Source: https://www.broadcom.com/info/symantec/web-isolation-demo-portal (annotated)



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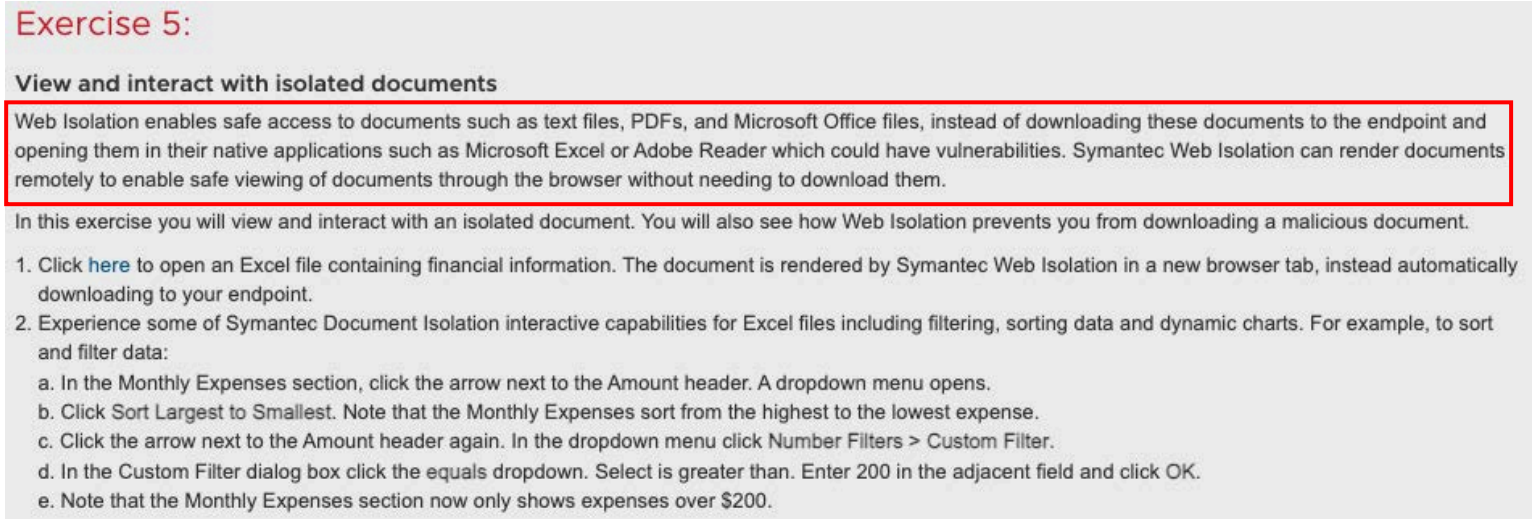
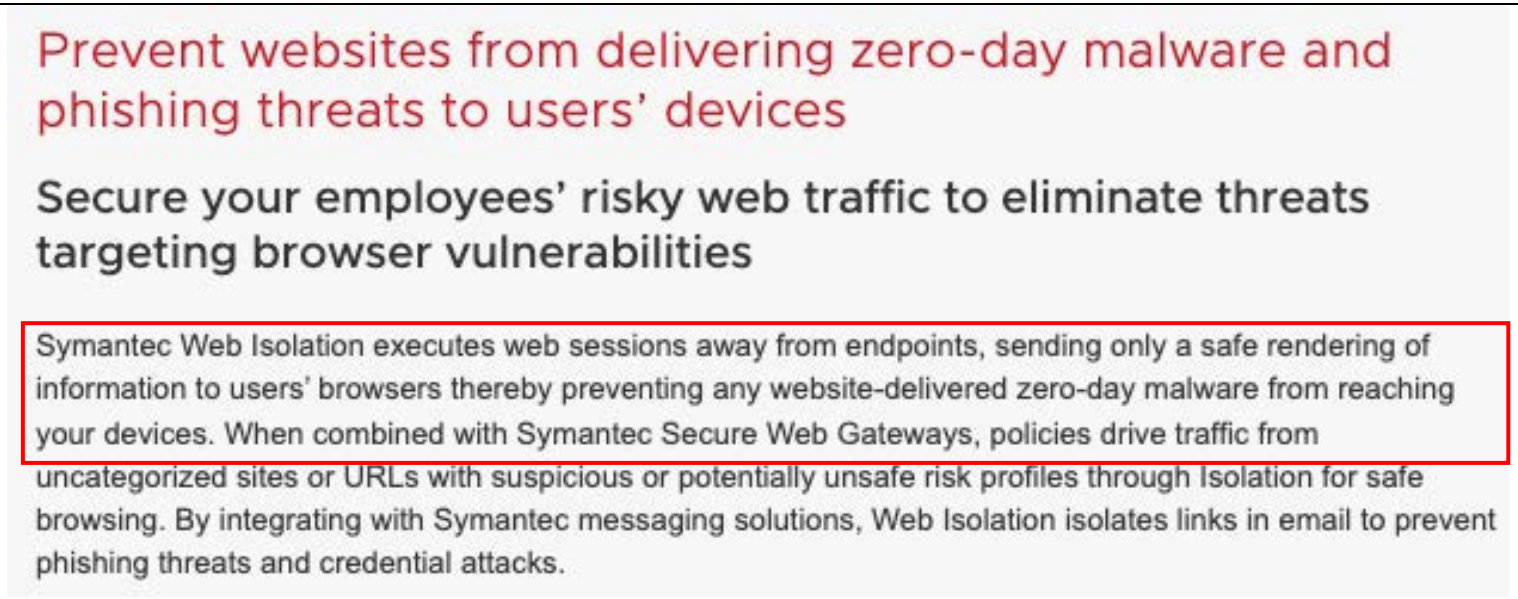
How Does This Work?

Symantec Web Isolation connects each active browser tab to a secure browser running in a container either on-premise or in the cloud. This secure browser interacts with the internet for the user, ensuring attacks stay away from the local machine, while preserving the user experience. Information from the secure browser is rendered back to the end user, and unless visually indicated, users may not even know they are being isolated. To ensure high system availability, Symantec dual mode isolation automatically selects the right method for each class of webpage, whilst providing an operational failsafe.

Source: https://www.security.com/feature-stories/symantec-web-isolation-essential-part-your-sase-strategy

	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.
[1.7] overlaying, by the software rendering application, the pixilated image data with a secure browser readable code set layer comprising at least one of a link, a fillable user input data field, an embedded video, or an embedded audio, wherein the browser readable code set includes the original user functionality of the responsive data; and	Company performs and induces others to perform the step of overlaying, by the software rendering application, the pixilated image data with a secure browser readable code set layer comprising at least one of a link, a fillable user input data field, an embedded video, or an embedded audio, wherein the browser readable code set includes the original user functionality of the responsive data; and. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, when the user tries to access content that may contain threats or malicious content, Web Isolation renders the web content such as text files, and PDFs into an interactive pixilated image. This prevents malware hidden in the content from reaching the user's endpoint. Therefore, upon information and belief, Web Isolation overlays the pixilated image data with a secure browser readable code set layer comprising at least one of a link, a fillable user input data field, an embedded video, or an embedded audio, wherein the browser readable code set includes the original user functionality of the responsive data.  Exercise 5: View and interact with isolated documents Web Isolation enables safe access to documents such as text files, PDFs, and Microsoft Office files, instead of downloading these documents to the endpoint and opening them in their native applications such as Microsoft Excel or Adobe Reader which could have vulnerabilities. Symantec Web Isolation can render documents remotely to enable safe viewing of documents through the browser without needing to download them. In this exercise you will view and interact with an isolated document. You will also see how Web Isolation prevents you from downloading a malicious document. 1. Click here to open an Excel file containing financial information. The document is rendered by Symantec Web Isolation in a new browser tab, instead automatically downloading to your endpoint. 2. Experience some of Symantec Document Isolation interactive capabilities for Excel files including filtering, sorting data and dynamic charts. For example, to sort and filter data: a. In the Monthly Expenses section, click the arrow next to the Amount header. A dropdown menu opens. b. Click Sort Largest to Smallest. Note that the Monthly Expenses sort from the highest to the lowest expense. c. Click the arrow next to the Amount header again. In the dropdown menu click Number Filters > Custom Filter. d. In the Custom Filter dialog box click the equals dropdown. Select is greater than. Enter 200 in the adjacent field and click OK. e. Note that the Monthly Expenses section now only shows expenses over $200. Source: https://www.broadcom.com/info/symantec/web-isolation-demo-portal



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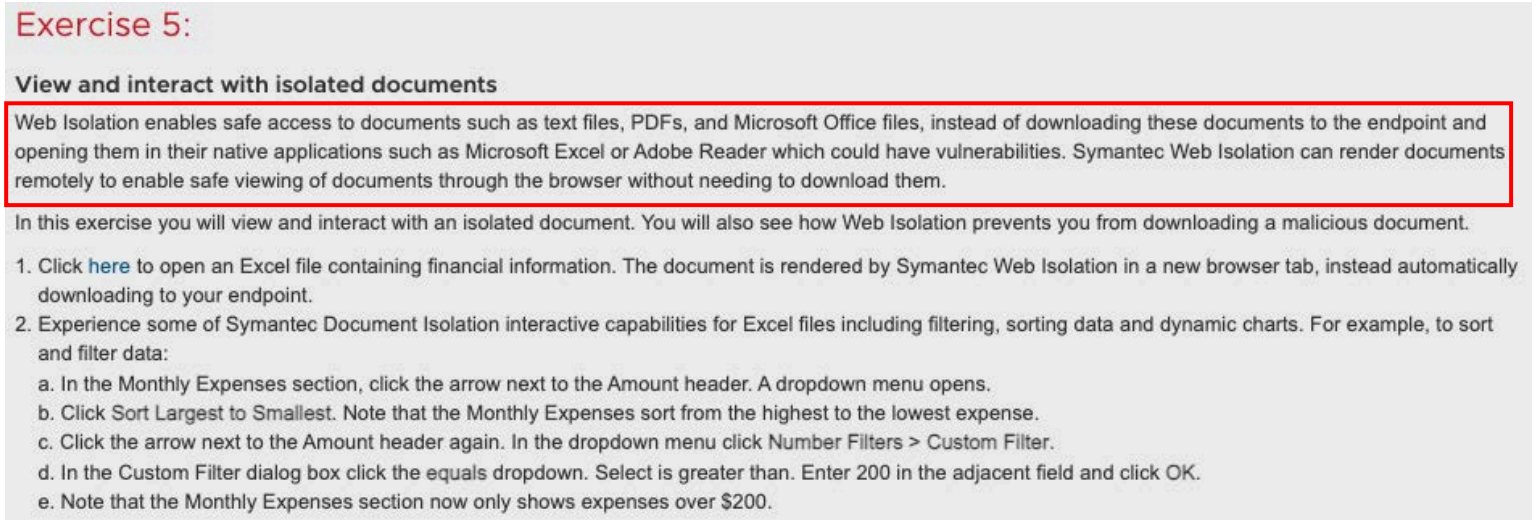
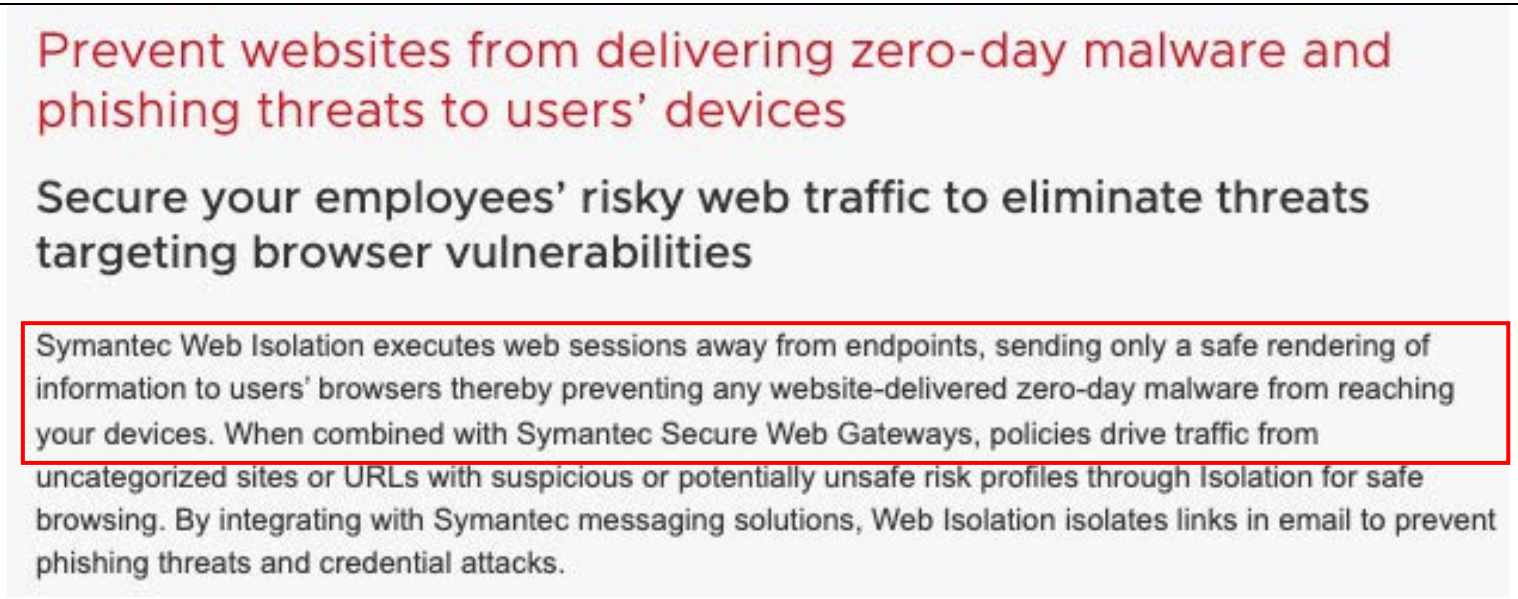
[1.8] sending the browser readable code set from the software rendering application to the user browser software.	Company performs and induces others to perform the step of sending the browser readable code set from the software rendering application to the user browser software. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, Web Isolation sends the rendered web content ("the browser readable code set") to the user's local browser ("the user browser software") for interaction.  Exercise 5: View and interact with isolated documents Web Isolation enables safe access to documents such as text files, PDFs, and Microsoft Office files, instead of downloading these documents to the endpoint and opening them in their native applications such as Microsoft Excel or Adobe Reader which could have vulnerabilities. Symantec Web Isolation can render documents remotely to enable safe viewing of documents through the browser without needing to download them. In this exercise you will view and interact with an isolated document. You will also see how Web Isolation prevents you from downloading a malicious document. 1. Click here to open an Excel file containing financial information. The document is rendered by Symantec Web Isolation in a new browser tab, instead automatically downloading to your endpoint. 2. Experience some of Symantec Document Isolation interactive capabilities for Excel files including filtering, sorting data and dynamic charts. For example, to sort and filter data: a. In the Monthly Expenses section, click the arrow next to the Amount header. A dropdown menu opens. b. Click Sort Largest to Smallest. Note that the Monthly Expenses sort from the highest to the lowest expense. c. Click the arrow next to the Amount header again. In the dropdown menu click Number Filters > Custom Filter. d. In the Custom Filter dialog box click the equals dropdown. Select is greater than. Enter 200 in the adjacent field and click OK. e. Note that the Monthly Expenses section now only shows expenses over $200. Source: https://www.broadcom.com/info/symantec/web-isolation-demo-portal



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2. List of References

1. https://docs.broadcom.com/doc/web-isolation-en, last accessed on 18 November 2024.
2. https://www.security.com/expert-perspectives/secure-web-surfing, last accessed on 18 November 2024.
3. https://www.security.com/feature-stories/symantec-web-isolation-essential-part-your-sase-strategy, last accessed on 18 November 2024.
4. https://www.broadcom.com/info/symantec/web-isolation-demo-portal, last accessed on 5 November
5. https://www.broadcom.com/products/cybersecurity/network/network-protection/web-isolation, last accessed on 18 November